

JUDGE CARTER

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KIPLING APPAREL CORP.,

Plaintiff,

v.

BOADING BAIGOU XINCHENG YOUNUO
TRADING CO., LTD, Shenzhen XinYu
Innovation Technology Ltd., TRAVISTAR,
TINY CHOU, Shenzhen Fancier Industrial Co.,
Ltd. (d/b/a Fansela), Bagtopia, KESEE, Melord,
Baisite Mall, Degohome, ITESoon, Big Mango,
CHUANGLI, Cloth Shake, Dijinghao Shop a/k/a
DJHbuy, Eaglebeky, Ecolaki, Edfamily, GuiShi
E-commerce Co., Ltd, Hynbase, YOUDE,
MiCoolker, Emily Boutique, The World of
Queenie Wong a/k/a Queenie, Shop D'Oro,
TianHengYi, YallFairy/YallFF, Noel Pullman,
NANRUI Trading, Honesty & Reliable store, and
Asm's Bag Store, John and Jane Does, AND
XYZ COMPANIES,

Defendants.

18 CV 8333

CASE NO. _____

**PLAINTIFF KIPLING APPAREL CORP.'S *EX PARTE* APPLICATION FOR A
TEMPORARY RESTRAINING ORDER, EXPEDITED DISCOVERY ORDER,
ORDER GRANTING SERVICE BY EMAIL AND ORDER TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION**

Plaintiff Kipling Apparel Corp. ("Kipling") seeks the *ex parte* entry of: (1) an Order temporarily restraining Defendants BOADING BAIGOU XINCHENG YOUNUO TRADING CO., LTD, Shenzhen XinYu Innovation Technology Ltd., TRAVISTAR, TINY CHOU, Shenzhen Fancier Industrial Co., Ltd. (d/b/a Fansela), Bagtopia, KESEE, Melord, Baisite Mall, Degohome, ITESoon, Big Mango, CHUANGLI, Cloth Shake, Dijinghao Shop a/k/a DJHbuy, Eaglebeky, Ecolaki, Edfamily, GuiShi E-commerce Co., Ltd, Hynbase, YOUDE, MiCoolker, Emily Boutique, The World of Queenie Wong a/k/a Queenie, Shop D'Oro, TianHengYi,

YallFairy/YallFF, Noel Pullman, NANRUI Trading, Honesty & Reliable store, and Asm's Bag Store, John and Jane Does, AND XYZ COMPANIES (collectively, "Defendants") from offering for sale their Infringing Products or otherwise infringing Kipling Trade Dress or Kipling Logo Marks; (2) an Order authorizing expedited discovery; (3) an Order authorizing service of process by electronic mail; and (4) an Order to show cause for preliminary injunction in an action arising out of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125; N.Y. Gen. Bus. 349 (McKinney); and New York common law. A Memorandum of Law in Support is being filed concurrently herewith.

Dated: September 13, 2018

Respectfully submitted,

By: 
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